

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-AEC

**THIRD & FINAL APPLICATION FOR COMPENSATION OF THE
LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST**

TO: THE HONORABLE AUSTIN E. CARTER
CHIEF JUDGE, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

COMES NOW Thomas T. McClendon, as Liquidating Trustee of the Galardi Creditors Trust (the "Trustee"), and files this, his *Third & Final Application for Compensation of the Liquidating Trustee of the Galardi Creditors Trust* (the "Application"), and in support thereof respectfully shows as follows:

1. On or about January 27, 2022, (the "Petition Date"), Teri G. Galardi (the "Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq.
2. On April 10, 2023, Debtor filed an Amended Joint Chapter 11 Plan of Reorganization (Doc. No. 401) ("Plan"). The Plan provided for the Debtor's establishment of a liquidating trust for the benefit of the Holders of Class 8 Unsecured Claims and the execution of a Trust Agreement for the Galardi Creditors Trust ("Trust Agreement") to be in effect on the Effective Date of the Plan.
3. On April 14, 2023 (the "Appointment Date"), the Court entered the Order Confirming Joint Plan of Reorganization (Doc. No. 410) ("Confirmation Order") confirming the Plan, authorizing the execution of the Trust Agreement, and appointing the Trustee.
4. On April 25, 2023, Debtor and Trustee executed the Trust Agreement.
5. The Court has jurisdiction over this Application pursuant to Article 9.1(m) of the Plan (retention of jurisdiction over all matters regarding or related to the administration of the Galardi Creditors Trust) and Section 7.2 of the Trust Agreement.

6. The Trustee shows that he has served as the Liquidating Trustee of the Galardi Creditors Trust in this case since the Appointment Date.

7. The Trustee has heretofore applied for interim compensation. The Trustee was previously awarded fees in the amount of \$164,044.00 and out-of-pocket expenses in the amount of \$5,652.64 by Order dated February 28, 2024 (Doc. No. 778) ("First Interim Fee Order") and in the amount of \$53,759.50 by Order dated June 26, 2024 (Doc. No. 899) ("Second Interim Fee Order") for services rendered in connection with this case.

8. The Trustee makes his Application for the allowance of compensation for professional fees from April 25, 2024 through August 22, 2025 ("Application Period"), pursuant to Section 4.8 of the Trust Agreement, and to the extent applicable, 11 U.S.C. §§ 330 and 331. All services for which compensation is requested were performed by the Trustee on behalf of the Galardi Creditors Trust and not on behalf of any other party, creditor, persons or party in interest.

9. The Trustee has performed services required of a Liquidating Trustee in the administration of the Galardi Creditors Trust, including but not limited to making distributions to Holders of Class 8 Unsecured Claims.

10. Pursuant to Section 4.8 of the Trust Agreement, the Trustee "will be paid at their standard hourly rate customarily charged to other clients."

11. The time expended by the Trustee and the work performed by the Trustee, for the period for which this Application is made, is duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated herein by this reference.

12. The out-of-pocket expenses incurred by the Trustee during the period for which this Application is made are duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated by this reference. The copy costs reflected on Exhibit "A" are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page.

13. The Trustee has not agreed to share any compensation awarded in this case with any person other than members of Trustee's law firm.

14. The Trustee respectfully makes the following representations with regard to the 12-factor Johnson test, to the extent the same is applicable:

- (a) Time and Labor Required: The Trustee has expended a total of 271.20 hours through August 22, 2025, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Tom McClendon	\$395.00 – \$425.00

Such rate is the rate as is customarily charged to other clients.

- (b) Novelty and Difficulty of Questions Presented: The Chapter 11 reorganization case involves the administration of the Galardi Creditors Trust including the resolution of distribution disputes and making distributions on more than \$20 million in unsecured claims. The Trustee shows that the novelty and difficulty of questions presented are more than those normally associated with a Chapter 11 bankruptcy case.
- (c) Skill Requisite to Perform Legal Services Properly: The Trustee respectfully represents that he has the skill requisite to perform the trustee services previously rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Trustee respectfully requests that the time expended by the Trustee in connection with this case could have been devoted to other matters, but for the time demands placed upon the Trustee by his involvement in this case.
- (e) Customary Fee for the Type of Services Rendered: The Trustee shows that all fees requested by the Trustee were generated by applying the Trustee's normal hourly billing rate to the number of hours actually expended. Such itemization is detailed on Exhibit "A".
- (f) Whether Fee is Fixed or Contingent: The Trustee's charges are subject to being awarded by this Court under 11 U.S.C. § 330 and the Trust Agreement. The Fee is thus not truly fixed or contingent but has some characteristics of both.

- (g) Time Limitations Imposed by Client or Other Circumstances: The Trustee shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Trustee has handled and is continuing to handle a large number of issues as the Liquidating Trustee in this case. The Court entered the Confirmation Order on April 14, 2023. The Trustee has served since the Appointment Date.
- (i) Experience, Reputation, and Ability of Attorneys: The Trustee respectfully represents that he has had a significant amount of experience in bankruptcy cases in this District.
- (j) Undesirability of the Case: The Trustee respectfully represents that this factor is not normally applicable to a Chapter 11 case but that this case does include unusual challenges.
- (k) Nature and Length of Professional Relationship with the Client: The Trustee shows that he has served as the Liquidating Trustee in this case from his appointment. Prior to the Appointment Date, the Trustee represented the Committee of Unsecured Creditors in this case. The Committee dissolved and has ceased to exist since the Effective Date of the Plan, April 14, 2023.
- (l) Awards in Similar Cases: The Trustee respectfully represents that his Application is in keeping with similar applications for Chapter 11 compensation filed in bankruptcy cases within this district.

15. The Trustee requests that any order entered granting this Application, once entered, be effective immediately by providing that any 14-day stay is waived under Bankruptcy Rule 6004(h).

WHEREFORE, the Trustee prays that it be allowed Chapter 11 compensation as follows:

- (1) \$104,379.50 representing fees;
- (2) \$768.72 representing actual out-of-pocket expenses incurred on by the Liquidating Trustee; and
- (3) that the Liquidating Trustee be authorized and directed to pay the \$105,148.22 requested award to the Liquidating Trustee from the Galardi Creditors Trust on a final basis and that any previous award be made final.

RESPECTFULLY SUBMITTED this 27th day of August, 2025.

/s/ Thomas T. McClendon
Thomas T. McClendon
Georgia Bar No. 431452
Jones & Walden LLC
699 Piedmont Avenue, NE
Atlanta, Georgia 30308
404-564-9300
tmccclendon@joneswalden.com
Liquidating Trustee

EXHIBIT "A" FOLLOWS

Document Page 7 of 18
JONES & WALDEN, LLC
 Attorneys At Law

699 Piedmont Avenue, NE * Atlanta, GA 30308
 404-564-9300 • www.joneswalden.com

Galardi Liquidating Trust
 c/o Tom McClendon, Trustee
 699 Piedmont Avenue NE
 Atlanta, GA 30308

Page: 1
 August 26, 2025
 Account No: 2345.006
 Invoice No: 74022

Re: Liquidating Trustee for Galardi Liquidating Trust

Fees

			Rate	Hours	
04/25/2024	TTM	review and calculate final numbers, emails on fee applications; 3rd distribution motion, email court for hearing date (1.0); drafting response to final decree; final review of fee applications, numbers to enter into 3rd distribution motion (1.5); reviewing 3rd distribution motion (2.0); review notice of filing of bank statements, all bank statements; email edits to Blake (.8); review Certificate of service; t/c LSJ, BD re: filing; final edits to 3rd motion (.6).	395.00	5.90	2,330.50
04/26/2024	TTM	review Certificate of service for additional parties needed (potential admin creditors (.5); edits to Certificate of service (.1); email Red Shield Funding re: default letter (.4); conf BLS re: hearing (.1).	395.00	1.10	434.50
04/29/2024	TTM	t/c Marsha Taylor re: 3rd distribution motion (.1); t/c Ainsworth re: Bain and Red Shield outstanding items (.2).	395.00	0.30	118.50
04/30/2024	TTM	t/c Jackie Torres re: 3rd distribution motion (.1); t/c Mitchell Benjamin re: settlement (.1).	395.00	0.20	79.00
	TTM	conf LSJ re: call with Guernsey (.1).	395.00	0.10	39.50
05/01/2024	TTM	conf BD re: creditor calls (.1).	395.00	0.10	39.50
05/02/2024	TTM	try Guernsey (.1); review sign Bain attorney fees settlement (.2); travel to SSB to transfer, closing Bain stipulation account (.6);	395.00	0.90	355.50
05/03/2024	TTM	t/c Mitchell re: client issues, wire; request Richard Law wire (.2); email Kyle George re: response (.1); email Valerie re: Long AP (.1); sign amended 1099 for Torres (.1); put together working binder for 6/4 hearing after informed about RSF filing (1.3); wires to Bridgers IOLTA; Richards Law IOLTA (.8); release Bridgers wire (.1); release Richards Law wire (.1); email to Jenisee Long (.1).	395.00	2.90	1,145.50
05/06/2024	TTM	t/c from Valerie re: need to continue 6/4 hearing if objection (.1).	395.00	0.10	39.50
05/07/2024	TTM	t/c Mutepe re: hearing, rescheduled date per call with Valerie (.2).	395.00	0.20	79.00

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 2

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
05/10/2024	TTM	follow up with Kyle George (.1); respond to email from Jenise Long (.2)	395.00	0.30	118.50
05/14/2024	TTM	review Guernsey objection (.6); conf LSJ re: sending Rule 11 to Guernsey/de Campo (.2); start drafting Galardi response (1.9).	395.00	2.70	1,066.50
05/15/2024	TTM	email Valerie re: notice or order continuing 6/4 hearing to 6/13 (.1); drafting reply to motion to disburse (4.7); t/c Ainsworth re: Guernsey response (.2); t/c Mutepe Akemon re: Guernsey response; Johnson motion, 6/13 hearing (.4).	395.00	5.40	2,133.00
05/16/2024	TTM	conf BLS re: drafting motion for sanction and Johnson MRAS response (.2); t/c Ronika Jones re: timing of distributions (.1); drafting reply in support of motion to disburse (1.4).	395.00	1.70	671.50
05/17/2024	TTM	finish draft of reply (3.1).	395.00	3.10	1,224.50
05/20/2024	TTM	review pleadings filed; t/c Mutepe re: thoughts (.5); conf BLS re: Rule 11 (.1); conf LSJ re: filings (.5); two calls with Joseph Guernsey (.8); review new filings by Guernsey (not discussed)(.4); t/c Denise (Court) re: hearing date (.2); drafting responses to Parker & Williams filings (3.3); t/c Denise (Court) re: hearing dates, how to notice out hearing on all the difference filings (.2); conf BLS; BD re: binder with all filings (.3); TV re: Notice of Hearing for 6/21 (.2).	395.00	6.60	2,607.00
05/21/2024	TTM	email creditors re: update requests (objections made so no distributions prior to hearing and ruling); review draft Notice of Hearing (.5); email Michael De Campo/Bourff re: his threat to file motion to remove (.1); t/c Ainsworth re: objections (.2); t/c Mutepe re: Long (.2).	395.00	1.00	395.00
05/22/2024	TTM	drafting reply to Kosachuk objection (.9).	395.00	0.90	355.50
05/23/2024	TTM	t/c from Akemon re: conversation with Chris Kosachuk, Astrid Gabbe (.4); t/c Astrid Gabbe (.4).	395.00	0.80	316.00
05/28/2024	TTM	t/c Akemon re: Gabbe conversations with Bourff (.2); draft default letters for Parker and Williams (.5); draft reply to Kosachuk filing on distribution (1.6).	395.00	2.30	908.50
05/29/2024	TTM	call from Akemon re: Bourff	395.00	0.20	79.00
06/03/2024	TTM	drafting responses to Kosachuk objections (2.1).	395.00	2.10	829.50
06/04/2024	TTM	drafting responses to Kosachuk objections (1.8); drafting responses to Guernsey objections to fees (1.0).	395.00	2.80	1,106.00
06/05/2024	TTM	drafting reply to Guernsey's objection to Trustee fee application (2.0); drafting response to Guernsey's objection to J&W fee application (1.5).	395.00	3.50	1,382.50

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 3

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
06/06/2024	TTM	respond to email from Long (.1); t/c from Ronika Jones re: status (.1).	395.00	0.20	79.00
06/10/2024	TTM	respond to Long's email (.1); t/c from Joe Guernsey (.3); t/c from Belinda Harris re: status (.2).	395.00	0.60	237.00
06/11/2024	TTM	t/c Ainsworth re: Guernsey motion to compel; 6/21 hearing (.3); finalizing Kosachuk replies (2.3).	395.00	2.60	1,027.00
06/12/2024	TTM	prepare 6/21 hearing outline; edits to replies (2.9); email Deleston re: hearing (.1).	395.00	3.00	1,185.00
06/13/2024	TTM	t/c from Astrid Gabbe (.3); editing Guernsey replies (.7).	395.00	1.00	395.00
06/14/2024	TTM	review orders in Long AP; draft Jenisee Long distribution letter (.8); finish edits to Kosachuk, Parker, Williams replies (1.4); t/c Mutepe re: confirming Long (.1); send Long wire (.5).	395.00	2.80	1,106.00
06/17/2024	TTM	conf LSJ re: replies (.1); conf LSJ re: LSJ edits (.2); make final edit;s conf LSJ; conf TV re: filing (1.9); same (.7); final edits, filing; email service copies to Court and each respondent (.9).	395.00	3.80	1,501.00
06/19/2024	TTM	conf LSJ re: prep for 6/21 hearing; cross examinations (.8).	395.00	0.80	316.00
06/20/2024	TTM	prepare for hearing, including preparing binders of exhibits, cross examinations, conf LSJ re: strategy (8.4).	395.00	8.40	3,318.00
06/21/2024	TTM	prepare for and attend hearing on motion to disburse; travel to/from Macon (11.2)	395.00	11.20	4,424.00
06/24/2024	TTM	edit/drafting order on distribution (1.5); email Kosachuk, Parker (.4); emails with Ms. Leahong (update) and Ms. Vaughn (hearing date) (.2); edits to orders granting fee applications (.6); conf LSJ re: orders; email Kosachuk, Parker (.3); conf LSJ re: orders; edits to same (.7).	395.00	3.70	1,461.50
06/25/2024	TTM	t/c from Akemon (.2); t/c LSJ re: Kosachuk email (.2); draft order denying motion to reconsider with prejudice (.6); continue drafting Kosachuk order(.7); return Dudley's call (.3); t/c from Akemon (.1); conf LSJ, edits to order; email Kosachuk (.3).	395.00	2.40	948.00
06/26/2024	TTM	t/c LSJ (.1); review redlines from Kosachuk; t/c from Akemon (.3); t/c from Akemon (.1); conf LSJ; t/c Kosachuk; Parker; redlines (1.3).	395.00	1.80	711.00
06/27/2024	TTM	t/c Kosachuk (.1); email Court re: need for hearing; prep for same (.4); t/c from Valerie re: content of hearing (.1); t/c from Valerie re: notifying for hearing; t/c Jamie Parker re: hearing (.2).	395.00	0.80	316.00
06/28/2024	TTM	edits to order per Kosachuk's email; email Kosachuk (.2); prepare for hearing; attend hearings, draft default letter to Kosachuk, edits to proposed order per hearing, draft notice of proposed hearing and redline (3.1); call from Felipa Flandes of			

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 4

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
		the Florida Bar re: Alexis King and Tabitha Brown (Michael Bourff's girlfriend per Felipa) complaint against Astrid Gabbe (.4).	395.00	3.70	1,461.50
07/08/2024	TTM	conf BD (.1); updates to creditors (.3); t/c from Mutepe Akemon re: new Kosachuk filing (.2); conf LSJ (.2); listen to voicemails from and t/c & email creditor updates (.3).	395.00	0.90	355.50
07/09/2024	TTM	review Kosachuk "amended" motion to vacate (.7).	0.00	0.70	0.00
07/10/2024	TTM	preliminary drafting of prevailing party motion (.5); review bills for time attributable to Guernsey, Kosachuk, Parker, and Williams (.6); conf LSJ re: Galardi; t/c Valerie re: conflict for LSJ on 7/25 (.2); t/c Valerie; email same re: previously scheduled hearings (.3); review appeal by Guernsey; t/c Akemon re: Guernsey, Gabbe apparent settlement (.3).	395.00	1.90	750.50
07/12/2024	TTM	review amended appeal by Guernsey; conf LSJ; write checks for final order fee apps (.5); conf LSJ; try Guernsey, email same (.2).	395.00	0.70	276.50
07/16/2024	TTM	review and outline all pending motions, joinders, appeals; drafting response to Kosachuk motion to set aside (1.5).	395.00	1.60	632.00
07/18/2024	TTM	drafting motions for contempt against Kosachuk, Williams (2.3); continue same (.9); research subpoena deficiencies (.6); edits to response to contempt against Ainsworth's clients (.3); same for Walker (.3); same for relief from settlement order (.5).	395.00	4.90	1,935.50
07/19/2024	TTM	review Gabbe default letter (.5); edits to contempt motions for Kosachuk, Williams (.8); finish same; conf LSJ, review case law on equitable mootness for distribution order (1.6).	395.00	2.90	1,145.50
07/22/2024	TTM	review LSJ edits to responses to Guernsey and Kosachuk, finalize for filing (1.0); t/c from Ainsworth (.3); t/c Mutepe (.3); conf LSJ re: preparing for trial on Kosachuk motion for relief (1.0).	395.00	2.60	1,027.00
07/23/2024	TTM	conf BD re: prep for hearing; t/c Lou McBryan re: Kosachuk representations; draft response to motion to continue (.7); review fedex subpoena from Kosachuk, research validity of serving subpoena by fedex (.5); conf BD re: drafting Kosachuk timeline (.3).	395.00	1.50	592.50
07/24/2024	TTM	prepare for trial on Guernsey Contempt Motion (2.4).	395.00	2.40	948.00
07/25/2024	TTM	attend hearings on motions for contempt by Guernsey, travel to/from (7.4) (less hour for lunch).	395.00	7.40	2,923.00
07/26/2024	TTM	review designation by Guernsey; email BD re: counter designation (.1).	395.00	0.10	39.50
07/29/2024	TTM	review designation of record by Guernsey, highlight portions of additional record; draft designation of record and issues on appeal; conf BD re: completing same (1.3); t/c from Ainsworth re:			

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 5

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
		Kosachuk filings (.4).	395.00	1.70	671.50
08/01/2024	TTM	t/c Kosachuk (.1); conf LSJ re: same (.2); t/c Ainsworth; Mutepe (.6).	395.00	0.90	355.50
08/02/2024	TTM	t/c Astrid re no right to appeal; draft term sheet to Kosachuk (.6); draft letter to Guernsey (.2).	395.00	0.80	316.00
08/08/2024	TTM	review designation of records for Guernsey/Kosachuk appeal (1.5); same (.7).	395.00	2.20	869.00
08/09/2024	TTM	Gabbe designation of record, confs BD re: same (.6).	395.00	0.60	237.00
08/12/2024	TTM	emails with Ms. Taylor-Owens re designation; review amended designation (.5).	395.00	0.50	197.50
08/13/2024	TTM	t/c from Ainsworth (.2).	395.00	0.20	79.00
08/19/2024	TTM	t/c Ainsworth re: Kosachuk (.1); conf WG re: research for appeal (.1).	395.00	0.20	79.00
08/21/2024	TTM	draft letter to Guernsey (.6); conf LSJ; WG re: next steps, filings (.7).	395.00	1.30	513.50
08/27/2024	TTM	t/c Akemon (.1); conf LSJ; email Kosachuk (.2)	395.00	0.20	79.00
	TTM	Drafting vexatious litigation motion against Kosachuk (2.5)	0.00	2.50	0.00
08/28/2024	TTM	drafting vexatious litigation motion (2.6); drafting motion to dismiss for new adversary proceeding (3.7).	0.00	6.30	0.00
08/29/2024	TTM	conf WG re: motion to dismiss research (.4).	395.00	0.40	158.00
08/30/2024	TTM	t/c from Mutepe (.2).	395.00	0.20	79.00
09/03/2024	TTM	review and calendar Gabbe briefing deadlines (.1); t/c from Ainsworth (.1).	395.00	0.20	79.00
09/09/2024	TTM	t/c Ainsworth; update Kosachuk contempt motion, finalize Parker motion; conf LSJ (1.7).	395.00	1.70	671.50
09/10/2024	TTM	attend pre-trial conference (.7); t/c Chuck Dalzeil re dismissing appeal (.4).	395.00	1.10	434.50
09/11/2024	TTM	email Court on Parker contempt motion hearing (.1).	395.00	0.10	39.50
09/23/2024	TTM	t/c Joe Guernsey, Chris Kosachuk (.2).	395.00	0.20	79.00
09/24/2024	TTM	t/c Mutepe (.2); review docket; prepare for 10/1 hearing (.9)	395.00	1.10	434.50
09/25/2024	TTM	t/c Guernsey (.2); conf LSJ (.2); t/c Kosachuk (.2); t/c Chris Terry (.4).	395.00	1.00	395.00
09/26/2024	TTM	review AP response draft; edit same; prepare for 10/2 hearing			

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 6

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
		(2.4); t/c Chris Terry; continue prepare hearing (.6); t/c Guernsey, conf LSJ re: same (.8)	395.00	3.80	1,501.00
09/27/2024	TTM	prepare for 10/1 hearing (2.8); t/c Ainsworth & Mutepe (.4); t/c Mutepe, Ainsworth, Guernsey re settlement with Guernsey; drafting settlement agreement with Guernsey (3.6).	395.00	6.80	2,686.00
09/30/2024	TTM	conf BD re: prep for evidentiary hearing (.3); email Kosachuk re: response to settlement proposal (.3); t/c Ainsworth, t/c Jammie Parker, prepare for hearing (1.9); t/c from Guernsey, t/c from Kosachuk (.5); t/c Ainsworth & Mutepe, conf LSJ (.5); finish prep for hearing (.8); t/c Ainsworth & Mutepe; conf LSJ, respond to Kosachuk's settlement offer (1.3); emails on Kosachuk settlement, call Teresa Irby, t/c Valerie Vaughn; research on dismissing appeal, conf LSJ re: same (1.2).	395.00	6.30	2,488.50
10/01/2024	TTM	t/c Chris Terry re: settlement, working towards closing case (.2); email Ainsworth re: no appeal briefs filed yet (.1).	395.00	0.30	118.50
10/03/2024	TTM	review late filed Gabbe brief; t/c Danzeil (.7); drafting Gabbe appeal brief outline (.5); t/c Ainsworth re appeal (.3); review LSJ redline to Guernsey settlement; email Guernsey; t/c same; drafting dismissal stipulation (separate from Kosachuk) (.5); t/c Guernsey; send settlement agreement draft to same (.4); t/c Guernsey re: appeal brief filed in his name (denies his), review property records for address brief mailed from (.4).	395.00	2.80	1,106.00
10/04/2024	TTM	t/c Guernsey, edit to settlement agreement (.4); t/c Guernsey, finalize settlement (.3); t/c Ainsworth (.3); conf LSJ re: dismissing appeal by motion, drafting motion to dismiss appeal by Guernsey and Trustee (.5); Gabbe brief research and drafting in preparation for Dalziel call (.9); t/c Chuck Dalziel (.3); draft lengthy email to Dalziel with points made and supporting documents with demand for Gabbe to dismiss appeal (.7).	395.00	3.40	1,343.00
10/07/2024	TTM	review Gabbe appeal brief; calendar same; t/c Guernsey; sign Guernsey settlement agreement (.6); draft consent order; t/c Guernsey (.2); sign motion to dismiss, review district court local rules whether any additional requirements to dismiss bankruptcy appeal (.4);	395.00	1.20	474.00
10/08/2024	TTM	review tracking from Guernsey; email TV re: filing motion to dismiss (.1); t/c Mutepe, conf LSJ, t/c Guernsey (.5); t/c from Mutepe (.2)	395.00	0.80	316.00
10/09/2024	TTM	email Dalziel (.1); drafting Gabbe appellee brief (2.5); same (2.4).	395.00	5.00	1,975.00
10/10/2024	TTM	t/c Ainsworth (.2); drafting Gabbe appeal appellee brief; emails with clerk re: accessing the record; conf BD re: inserting records cites, TOC, and authorities	395.00	3.90	1,540.50
10/11/2024	TTM	work on Gabbe brief (.5); conf BD re: appellee brief (.2).	395.00	0.70	276.50

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 7

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
10/14/2024	TTM	review transcript of proceedings for Gabbe's statements, not raising issue currently on appeal (.3).	395.00	0.30	118.50
10/15/2024	TTM	review and edit Gabbe brief (1.3), motion for contempt (.7)	395.00	2.00	790.00
10/17/2024	TTM	conf BLS re: motion for frivolous appeal (.1); edits to Gabbe brief; review appendix requirements; conf BD re: same (.8).	395.00	0.90	355.50
10/18/2024	TTM	edits to motion for sanctions against Gabbe (.6); t/c from Guernsey (.1); t/c Akemon (.2); conf BLS re: same (.3); edits to same; email LSJ (.2).	395.00	1.40	553.00
10/21/2024	TTM	conf TV re: appendix (.1); conf EW re: MOR (.1); conf TV re: appendix (.2); work on appendix (.5); finalizing Gabbe brief (1.2).	395.00	1.60	632.00
10/22/2024	TTM	email Theresa Irby re: AP Trustee parties still showing as defendants (.1).	395.00	0.10	39.50
10/24/2024	TTM	email with Valerie re: setting contempt; conf TV (.2); email from Kosachuk threatening another lawsuit, call Guernsey re: any knowledge on same (.4); drafting motion to expedite motions (.5).	395.00	1.10	434.50
	TTM	Updating vexatious litigation motion (.4)	0.00	0.40	0.00
10/25/2024	TTM	email Kosachuk (.1).	395.00	0.10	39.50
10/29/2024	TTM	conf LSJ re: letters, emails from Gabbe & Kosachuk (.3).	395.00	0.30	118.50
10/30/2024	TTM	email Guernsey (.1).	395.00	0.10	39.50
11/05/2024	TTM	t/c Chuck Daziel (says not competent to practice law); conf LSJ (.4).	395.00	0.40	158.00
11/15/2024	TTM	email Leahong re: Galardi status (.1); email Gabbe re: appeal (.1).	395.00	0.20	79.00
11/18/2024	TTM	email Valerie; Kosachuk (.2); t/c Valerie; email Kosachuk (.2).	395.00	0.40	158.00
11/19/2024	TTM	email Astrid (.1); same, t/c Mutepe (.2).	395.00	0.30	118.50
11/20/2024	TTM	email Astrid (.2).	395.00	0.20	79.00
11/27/2024	TTM	conf LSJ re: contempt hearing against Gabbe (.2).	395.00	0.20	79.00
12/02/2024	TTM	attend hearing on motion to hold Gabbe in contempt; travel to/from same (4.8).	395.00	4.80	1,896.00
12/05/2024	TTM	review amended complaint and motion for leave to amend sent by Kosachuk, point by point response (1.6); t/c from Ainsworth re: Kosachuk email (.3); attend hearing in Kosachuk AP, follow up with Ainsworth (1.4).	395.00	3.00	1,185.00

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 8

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
12/09/2024	TTM	conf LSJ (.2); hearing on Parker/William show cause order (.2); email Astrid (.1).	395.00	0.50	197.50
12/10/2024	TTM	t/c Ainsworth; email Valerie re: contempt motions (.2).	395.00	0.20	79.00
12/11/2024	TTM	draft response to Kosachuk motion for leave to re-sue trustee and trust (1.9); same (.3).	395.00	2.20	869.00
12/13/2024	TTM	finalize response to leave to amend, motion for rule 11 sanctions letter, and default letter to Kosachuk (1.0); email to Gabbe with settlement offer and request for stipulation if not (.4).	395.00	1.40	553.00
12/17/2024	TTM	email Gabbe; prepare exhibits (.8).	395.00	0.80	316.00
12/19/2024	TTM	t/c Mutepe re: communications from Michael De Campo (1.); conf LSJ strategy going forward; t/c Valerie; review notice of continued hearing (.6).	395.00	0.70	276.50
12/20/2024	TTM	edits to Gabbe sanctions reply brief (.7); same (1.1).	395.00	1.80	711.00
12/23/2024	TTM	return Guernsey's call (.1); final edits to reply on Gabbe sanctions (.5).	395.00	0.60	237.00
01/08/2025	TTM	conf EW re: Galardi CPA documents (.1).	425.00	0.10	42.50
01/13/2025	TTM	review motion to compel, expedite, Rule 11 sanctions (.8); t/c from deputy clerk re: uploading order granting expedite, conf TV re: drafting (.2); review expedite order (.1); t/c from deputy clerk re: order (.2).	425.00	1.30	552.50
01/14/2025	TTM	t/c Ainsworth re: upcoming hearing; conf LSJ re: same (.4).	425.00	0.40	170.00
01/15/2025	TTM	email from Steven Rumford re: need for 1099 distribution list; drafting same (3.5) conf BD re: double-checking numbers (.3).	425.00	3.80	1,615.00
01/16/2025	TTM	conf BD re: 1099s (.1); conf BD; email Steven Rumsford re: production of 1099s (1); review bill for Contempt motion against Kosachuk (.3).	425.00	0.50	212.50
01/17/2025	TTM	draft supplement to Rule 11 and contempt motions (.7); prepare supplement (.2)	425.00	0.90	382.50
	TTM	email Steven Rumford re: taxes and 1099s (.1).	425.00	0.10	42.50
01/20/2025	TTM	review and email Steven Rumford (.2).	425.00	0.20	85.00
01/23/2025	TTM	email Valerie (.1); respond to Rumford (.1); t/c Steven Rumford (.1); email Valerie re: hearing (.1).	425.00	0.40	170.00
01/27/2025	TTM	t/c Steven; conf BD re: distributions (.3); draft form email to creditors re: tax forms; conf BD re: 1099-NECs (.2)	425.00	0.50	212.50
01/28/2025	TTM	conf BD re: 1099s (.1).	425.00	0.10	42.50
	TTM	respond to multiple beneficiary tax inquiries, how calculated (.6).	425.00	0.60	255.00

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 9

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
01/29/2025	TTM	email beneficiaries re: tax documents (.1); conf LSJ re: Kosachuk demand for discovery on motion for contempt; respond to Kosachuk (.1).	425.00	0.20	85.00
02/03/2025	TTM	t/c Mutepe Akemon re: Bain creditor's 1099.	425.00	0.10	42.50
02/04/2025	TTM	t/c Marquita Ward re: distribution numbers (.1).	425.00	0.10	42.50
02/13/2025	TTM	t/c Queen Saunders re: 1099 (.2).	425.00	0.20	85.00
02/18/2025	TTM	email Valerie Vaughn re: request for continuance (.2); calls from Guernsey, Dudley re: hearing (.2).	425.00	0.40	170.00
02/19/2025	TTM	prepare for contempt hearing; review bill for Gabbe, conf MG re: creating Gabbe contempt bill (1.9).	425.00	1.90	807.50
02/21/2025	TTM	prep for, travel to/from hearing, attend hearing on motion to amend, motion to dismiss, motions for contempt against Gabbe, Kosachuk, Rule 9011 against Kosachuk (7.9).	425.00	7.90	3,357.50
02/24/2025	TTM	review court notes for supplemental briefing, calendar same (.1).	425.00	0.10	42.50
02/25/2025	TTM	review order setting briefing schedule; conf BLS re: drafting supplemental brief (.2); email Valerie re: continued hearing (.1).	425.00	0.30	127.50
02/26/2025	TTM	t/c Guernsey (.2).	425.00	0.20	85.00
03/03/2025	TTM	start response to motion to withdraw reference (.7).	425.00	0.70	297.50
03/04/2025	TTM	finish response to motion to withdraw reference (1.3).	425.00	1.30	552.50
03/05/2025	TTM	review LSJ redlines to response to motion to withdraw; email for filing (.3).	425.00	0.30	127.50
03/10/2025	TTM	review sign tax return, work on downloading grantor statements for disbursement, email re: same (.3).	425.00	0.30	127.50
03/11/2025	TTM	download grantor statements from CPA; conf BD re: sending out (.2).	425.00	0.20	85.00
03/12/2025	TTM	review, edit supplemental brief, draft declaration for additional fees (.9).	425.00	0.90	382.50
03/13/2025	TTM	finish editing brief, supplemental declaration (.8).	425.00	0.80	340.00
04/01/2025	TTM	drafting response to new motion for contempt by Kosachuk (1.1); call from Guernsey re: hearing (.1).	425.00	1.20	510.00
04/02/2025	TTM	prepare for hearing on motion to amend (.3); attend hearing (.6); call with LSJ, Kosachuk on break (.2); attend part 2 of hearing, conf LSJ re: same (.4).	425.00	1.50	637.50

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 10

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
04/04/2025	TTM	drafting response to motion to strike by Kosachuk (.5).	425.00	0.50	212.50
04/08/2025	TTM	conf BLS re: Rule 11 letter and motion, updating abusive litigant motion against Kosachuk (.5).	425.00	0.50	212.50
04/09/2025	TTM	review Rule 11 letter & motion, sign letter for service on Kosachuk (.2)	425.00	0.20	85.00
04/10/2025	TTM	conf BLS re: drafting abusive litigant motion (.1); same (.2); edits to motion (.9).	0.00	1.20	0.00
04/14/2025	TTM	edits to motion to declare Kosachuk a vexatious litigant (.8).	0.00	0.80	0.00
04/16/2025	TTM	review orders on show cause, contempt, calendar same (.1).	425.00	0.10	42.50
04/17/2025	TTM	review order denying Kosachuk's motion to withdraw reference (.2); review notice of hearing in Gabbe appeal, calendar same, email to Dudley and Akemon (.2).	425.00	0.40	170.00
04/24/2025	TTM	email Marsha Taylor re: request for breakdown of allocation (.3); second response to Taylor (.3).; t/c Mupete Akemon re: same (.1).	425.00	0.70	297.50
04/25/2025	TTM	t/c Mutepe re: email from court (he thought missed hearing)	425.00	0.20	85.00
04/29/2025	TTM	t/c Mutepe re: contempt hearing (.2).	425.00	0.20	85.00
04/30/2025	TTM	review email from Kosachuk; conf LSJ re: same; draft order on pre-filing restrictions; email Kosachuk re: offer (.8).	425.00	0.80	340.00
05/01/2025	TTM	attend hearing on Kosachuk's motion for contempt, travel to/from (6.3).	425.00	6.30	2,677.50
05/05/2025	TTM	review IRS notice of incorrect SSN for Duhart; conf BD re: drafting letter to same (.3).	425.00	0.30	127.50
05/14/2025	TTM	t/c from Ainsworth (.1).	425.00	0.10	42.50
05/21/2025	TTM	email Deleston re: request for update (.1).	425.00	0.10	42.50
05/22/2025	TTM	attend by phone Show Cause hearing for Charles Dalziel (.4).	425.00	0.40	170.00
05/27/2025	TTM	initial prep for Gabbe appeal hearing (.7).	425.00	0.70	297.50
05/28/2025	TTM	conf LSJ re: Gabbe Appeal hearing (.2); continue prep (.6).	425.00	0.80	340.00
05/29/2025	TTM	prepare for Gabbe Appeal hearing (3.4).	425.00	3.40	1,445.00
06/03/2025	TTM	prepare for Gabbe Appeal hearing (.7); attend hearing on motion for sanctions & dismissal, travel to/from (5.3).	425.00	6.00	2,550.00
06/13/2025	TTM	conf LSJ re: proffer in appeal (.1); conf LSJ re: motion for 60 relief based on fees (.1).	425.00	0.20	85.00

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 11

08/26/2025

Account No: 2345.006

Invoice No: 74022

			Rate	Hours	
06/14/2025	TTM	Drafting Rule 60(b) motion on third distribution order (1.8).	425.00	1.80	765.00
06/16/2025	TTM	draft supplemental declaration of fees for Gabbe appeal (.6).	425.00	0.60	255.00
06/17/2025	TTM	final review of supplemental declaration (.2).	425.00	0.20	85.00
06/24/2025	TTM	drafting motion to amend distribution order (2.4); attend hearing on Dalziel show cause (.5).	425.00	2.90	1,232.50
06/25/2025	TTM	working on motion to amend third distribution order (1.1).	425.00	1.10	467.50
06/27/2025	TTM	finish drafting motion to amend distribution order, conf LSJ re: same (.9).	425.00	0.90	382.50
07/01/2025	TTM	finalize motion to amend third distribution order (.4); t/c Mutepe re: need to file; finish finalizing and filing (.3).	425.00	0.70	297.50
07/21/2025	TTM	review judgment in Gabbe appeal; review FRAP for deadline to appeal (.1).	425.00	0.10	42.50
07/30/2025	TTM	t/c from Guernsey (.1).	425.00	0.10	42.50
08/07/2025	TTM	t/c from Mutepe Akemon re: Astrid Gabbe's death, conf LSJ, review rules re: same (.5).	425.00	0.50	212.50
08/11/2025	TTM	conf LSJ re: closing out case (.2); reviewing distribution motion, chart for edits needed to update current situation (.6).	425.00	0.80	340.00
08/12/2025	TTM	conf EW re: UST report (.1); reviewing 3rd distribution calculations for updates; supplement to motion to amend (.4); reviewing fee statements for supplement (.8) (no charge); same (1.1) (no charge).	425.00	0.50	212.50
08/13/2025	TTM	t/c Mutepe re: Gabbe death; edit suggestion of death (.4); drafting supplement to motion to amend, proposed order (.7); t/c from Mutepe Akemon (.2); editing proposed order (1.0).	425.00	2.30	977.50
08/15/2025	TTM	t/c Chris Edwards re: fees for preparing 2025 tax return (.1); t/c from Ainsworth (.1); conf LSJ re: filings, strategy re: winddown (.3); review Kosachuk fees; conf MG re: updating same (.3).	425.00	0.80	340.00
08/18/2025	TTM	t/c Mutepe re: Gabbe's estate (.1).	425.00	0.10	42.50
08/19/2025	TTM	conf EW, BD re: UST reports (.4); conf BD re: same (.2).	425.00	0.60	255.00
08/21/2025	TTM	conf BD, EW re: UST reports (.2); t/c from Joe Guernsey (.1); conf LSJ re: wrap up (.3); review UST reports; redlines of motions (.5); further conference with LSJ re: wrapping up case (.5).	425.00	1.60	680.00
08/22/2025	TTM	call from clerk re: hearing dates; filing Certificate of service for Kosachuk affidavit (.2).	425.00	0.20	85.00

Galardi Liquidating Trust

Re: Liquidating Trustee for Galardi Liquidating Trust

Page: 12

08/26/2025

Account No: 2345.006

Invoice No: 74022

For Current Services Rendered	Rate	Hours	
		271.20	104,379.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Tom T. McClendon	11.90	\$0.00	\$0.00
Tom T. McClendon	194.10	395.00	76,669.50
Tom T. McClendon	65.20	425.00	27,710.00

Expenses

07/25/2024	Mileage to/from Hearing	116.58
09/26/2024	Postage (3 @ .69)	2.07
09/30/2024	Online real estate records search	45.80
09/30/2024	Online legal research	140.75
10/09/2024	Postage (2 @ .97)	1.94
10/21/2024	Postage	0.97
10/30/2024	Postage	0.69
10/31/2024	Postage	0.69
12/02/2024	Mileage to/from Macon for hearing	123.28
12/13/2024	Federal Express	35.51
12/13/2024	Postage (5 @ .97)	4.85
12/19/2024	Postage	0.69
01/01/2025	Fee for Online Court Documents (PACER)	6.10
01/14/2025	Postage (3 @ 1.25)	3.75
01/29/2025	Postage (58 @ .69)	40.02
05/01/2025	Mileage to/from Middle District BK Court	121.24
05/07/2025	Postage	1.25
06/03/2025	Mileage to/from Macon for hearing	121.80
08/22/2025	Postage	0.74
	Total Expenses	768.72
	Total Current Work	105,148.22